

IN THE NORTHERN DISTRICT COURT OF OKLAHOMA  
UNITED STATES OF AMERICA

PHILIP SANDERS, an Individual )  
and Husband and Next of Kin of )  
BRENDA JEAN SANDERS, Deceased, )

Plaintiff(s), )

-vs- )

No. 17-CV-492-JHP-FHM )

CREEK COUNTY BOARD OF COUNTY )  
COMMISSIONERS, and SHERIFF )  
BRET BOWLING, in his official )  
capacity as Creek County )  
Sheriff, and TURN KEY HEALTH )  
CLINICS, a limited liability )  
company. )

Defendant(s). )

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DEPOSITION OF LELA J. GOATLEY,  
TAKEN ON BEHALF OF THE PLAINTIFF(S),  
IN THE MARTIN, JEAN, and JACKSON LAW OFFICE.

IN PONCA CITY, OKLAHOMA,  
ON MONDAY, MAY 11TH, 2020,  
STARTING AT 9:40 A.M.

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**EXHIBIT**

tab 10

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REPORTED BY: Sherrie L. Powell, CSR  
Precision Depositions  
P. O. Box 118  
Newkirk, OK 74647

1 Q. So if someone's got on scrubs and they work at the  
2 jail, could -- could someone assume they're an RN?

3 A. I suppose they could. But they shouldn't.

4 Q. Well, you think they thought they were an inmate  
5 wearing scrubs?

6 A. Wouldn't think so.

7 Q. You think they thought they were a correctional  
8 officer wearing scrubs?

9 A. Probably not.

10 Q. So it would be kind of hard to make that mistake,  
11 wouldn't it?

12 A. Well, I suppose what I'd say is that you should  
13 know what you're talking about before you call  
14 somebody something, because there were only LPNs  
15 there.

16 Q. Perhaps if it would have been an RN she wouldn't  
17 have died; right?

18 A. No. That --

19 MS. THOMPSON: Object to form.

20 A. That's --

21 MR. RICHARDSON: Basis?

22 THE WITNESS: Pardon me?

23 MR. RICHARDSON: No. Basis to her object-  
24 ion.

25 MS. THOMPSON: I don't have to provide you